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October 15, 2024

Re: *Williams-Israel v. Iris Energy Limited, et al.*, 1:24-cv-07046

The Honorable Peggy Kuo
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Dear Judge Kuo:

We represent Iris Energy Limited (f/k/a “Iris” and hereinafter, “IREN”), Daniel Roberts, William Roberts, and Belinda Nucifora (collectively, “Defendants”) in the above-referenced action. Pursuant to Rule IV of the Court’s Individual Practices in Civil Cases, we write to request an extension of time for all Defendants to answer or otherwise respond to the putative class action complaint (the “Complaint”) (ECF No. 1) as described below.

On October 7, 2024, Plaintiff commenced this case by filing the Complaint. On October 11, 2024, Plaintiff requested and Defendants agreed to waive the service of the summons and complaint; Defendants’ deadline to answer or otherwise respond to the Complaint is therefore currently December 10, 2024 under Federal Rule of Civil Procedure 4(d)(3).

This case is a putative class action, and the Complaint asserts federal securities claims that are governed by the Private Securities Litigation Reform Act of 1995 (“PSLRA”). See 15 U.S.C. § 78u-4 et seq. The PSLRA provides putative members of the class an opportunity to file motions to serve as lead plaintiff and lead counsel of the purported class within sixty days of notice of the action being published. See 15 U.S.C. § 78u-4(a)(3). Defendants understand that notice was published on October 7, 2024, as a result of which the deadline for lead plaintiff motions in this action is December 6, 2024.

Because the party appointed as lead plaintiff would typically file a consolidated or amended complaint, which would supersede the Complaint, Defendants respectfully request an adjournment of any deadline to answer or otherwise respond to the Complaint until after the Court appoints a lead plaintiff and lead counsel.

Subject to the Court’s approval, Plaintiff and Defendants have agreed that within fourteen days after the entry of an order by the Court appointing a lead plaintiff and lead counsel, counsel for defendants will meet and confer with lead counsel regarding a proposed schedule for the filing of any consolidated or amended complaint and for the anticipated motion to dismiss the operative complaint. This agreement is subject to Defendants’ express reservation of all rights, defenses or other objections (other than insufficient service of process), and without prejudice to any party seeking further extensions from the Court.

This is the first request to the Court by Defendants for an extension of time to answer or otherwise respond to the Complaint. Plaintiff assents to the requested extension.

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In light of the foregoing, we respectfully request that the Court grant this letter motion to extend the time for Defendants to answer or otherwise respond to the Complaint as set forth above.

Respectfully submitted,

/s/ Edmund Polubinski

Edmund Polubinski

cc: All counsel of record

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